

1 JULY 2021 Rev D

# **Responsible Minerals and Materials Policy**

## 1. PURPOSE

This policy provides a framework through which TE Connectivity Ltd. and its affiliated companies ("TE") shall respond to the growing trend toward minerals and materials due diligence in global supply chains, as well as comply with related legal requirements, most notably Section 1502 of the Dodd Frank Wall Street Reform and Consumer Protection Act pertaining to Conflict Minerals and other legal requirements relating to sourcing from conflict affected high risk areas. This policy is applicable to all TE business and functional units and entities globally.

## 2. SCOPE

#### 2.1. Content

On August 22, 2012, the U.S. Securities and Exchange Commission ("SEC") published regulations implementing Section 1502 of the Dodd Frank Wall Street Reform and Consumer Protection Act ("Act") governing Conflict Minerals. The Act requires companies to perform due diligence on the source and chain of custody of Conflict Minerals contained in their products. As a family of companies subject to this regulation, having an affiliate that is a US issuer of securities governed by the SEC, TE adopts this policy to guide the implementation and maintenance of its Conflict Minerals program.

In addition, since the adoption of the Act, efforts to expand disclosure of any minerals or materials sourced from conflict affected areas (commonly referred to as "Conflict Minerals") used in the production of any product(s) have expanded globally. As a result, TE has expanded the scope of the diligence we expect from our suppliers to include any mineral or metal as defined under the following, without limitation: (i) Section 1502 of the Dodd Frank Wall Street Reform and Consumer Protection Act, (ii) the European Union (EU) Conflict Minerals Regulation, or (iii) other applicable law (if and as applicable).

### 2.2. Application

This policy applies to TE and its subsidiaries, affiliates and units worldwide.

### 3. REFERENCED DOCUMENTS

- 3.1 This Policy is consistent with other relevant TE policies, procedures and documents.
  - TEC-1015 Guide to Supplier Social Responsibility
  - TE Global Terms and Conditions of Purchase
  - TE Guide to Ethical Conduct
  - TE Slavery and Human Trafficking Statement
  - TEC-01-71 Human Trafficking & Modern Slavery Policy

### 4. DECLARATION

- 4.1 TE strives to have a Conflict Free supply chain meaning that the metals and materials in our supply chain are sourced in an ethical manner that does not promote armed conflict or inhumane treatment -- and TE is committed to sourcing products and materials from non-conflict sources;
- 4.2 TE expects that its suppliers have due diligence processes in place to identify the source of the metals and minerals contained in their products, and that those sources do not support conflict and violations of human rights;
- 4.3 This expectation is communicated in TE's *Guide to Ethical Conduct*, which states TE conducts business with suppliers who share our commitment to high ethical standards and operate in a responsible and ethical manner.



4.4 TE expects its suppliers to source from conformant or active smelters or refiners ("SORs"), that have been validated through third party accredited audits such as: RMAP, LBMA, RJC, or TI-CMC.

TE is dedicated to working with its suppliers to help establish traceability of Conflict Minerals and assure that our products and materials are responsibly sourced. Suppliers who are not responsive to TE's requests for information via our survey processes may be disqualified from doing business with TE or be subject to purchase order blocks in TE's ERP system. When confronted with noncompliant sources of supply, TE will look to establish new sources for products and materials where the origin of Conflict Minerals in those products cannot be ascertained.

Lastly, TE is committed to a work environment and supply chain that is free from human trafficking and slavery, which includes forced labor and unlawful child labor. In addition to TE's supplier onboarding requirements that require our suppliers and service providers to agree to the TEC-1015 (which also incorporates by reference the *TE Guide to Ethical Conduct*) as noted above, TE addresses human rights risk in its supply chain as detailed in TE's *Slavery and Human Trafficking Statement*.

# 5. NOTE ON GOLD SALTS

Some confusion exists as to whether or not gold salts remain in scope for Conflict Minerals due diligence under the SEC regulations. To date, the SEC has not released any affirmative guidance that gold salts are exempt, and as such, TE plating suppliers shall be expected to establish the source of the gold salts integrated into plating baths and applied to our products.